



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

October 26, 2012

Mr. Joseph Macri, NSA
Bethesda Public Affairs Office
8901 Wisconsin Avenue
Bethesda, Maryland 20889

Subject: Draft Environmental Impact Statement (DEIS) for the Medical Facilities Development and University Expansion, Navel Support, Bethesda, Montgomery County, Maryland (CEQ # 20120268)

Dear Mr. Macri:

In accordance with Section 102(2) (C) of the National Environmental Policy Act (NEPA), 42 U.S.C. § 4332(2) (C), Section 309 of the Clean Air Act, 42 U.S.C. § 7609, and the Council on Environmental Quality (CEQ) regulations, 40 CFR Parts 1500-1508, the United States Environmental Protection Agency (EPA), has reviewed the DEIS for the above referenced project.

As you are aware, the DEIS is for the evaluation of the potential environmental impacts of the Medical Facilities Development and the University Expansion. In the case of the Medical Facilities Development four alternatives were evaluated including an overall project no build alternative. The preferred alternative included:

- The demolition of five hospital buildings and the construction of a single 5-story facility and associated underground parking garage
- Internal renovation of five hospital buildings
- Interim medical facilities during construction
- Utility upgrades
- Accessibility and appearance improvements
- Internal and external renovations of a workshop/warehouse to office space.

The University Expansion component of this project included the construction of a new education/research facility and associated above ground parking garage along with some internal renovations to a number of existing university buildings. Two alternative site locations were evaluated with the preferred alternative being located west of the current university campus.

EPA has developed a set of criteria for rating Draft Environmental Impact Statements to provide a basis upon which EPA makes recommendations to the lead agency. Based on this

rating system, EPA considers the Medical Facilities Development and University Expansion DEIS as a Lack of Objection (LO). A LO rating means the EPA review has not identified any environmental impacts requiring any substantive changes to the preferred alternative. A copy of our rating system is attached, and can also be found at:
<http://www.epa.gov/Compliance/nepa/comments/ratings.html>.

While EPA has rated the project as a LO, it has the following recommendations:

1. In order for Low Impact Development (LID) Stormwater Management measures to be effective they need to be introduced into the project initial design.
2. The overall project is in alignment with the Energy Policy Act of 2005, the Energy Independence and Security Act of 2007, Executive Orders 13514 and 13423, and is adhering to the sustainable practices of the Leadership in Energy and Environmental Design (LEED) silver features. It is suggested that Green Roof designs be incorporated into the project.

EPA appreciates the opportunity to comment on the proposed project. NSA Bethesda and the Navy should continue the effort to avoid and minimize the project impacts to the ecological community. If you have any questions regarding our concerns, please feel free to contact me or Kevin Magerr at (215) 814 5724

Sincerely,



Barbara Rudnick, PG
NEPA Team Leader
Office of Environmental Programs